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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 MARIA AGNE, on her own behalf and on
10 behalf of other similarly situated persons,

11 Plaintiffs,

12 v.

13 RAIN CITY PIZZA, L.L.C., an unknown
14 business entity; EDWARD TALIAFERRO,
15 individually and doing business as RAIN CITY
16 PIZZA, L.L.C.; KEVIN SONNEBORN,
17 individually and doing business as RAIN CITY
18 PIZZA, L.L.C. and ROSE CITY PIZZA,
L.L.C.; ROSE CITY PIZZA, L.L.C., an
Oregon limited liability company; PAPA
JOHN'S USA, INC., a Kentucky corporation;
and PAPA JOHN'S INTERNATIONAL, INC.,
a Delaware corporation,

19 Defendants.

NO. 2:10-cv-01139

NOTICE OF REMOVAL

(King County Superior Court Civil Case
No. 10-2-19384-7 SEA)

20 **I. INTRODUCTION**

21 Defendants, Rain City Pizza, L.L.C., Edward Taliaferro, Kevin Sonneborn, Rose City
22 Pizza, L.L.C. (Defendants) hereby give notice that they are removing the above-captioned
23 cause, originally filed in the Superior Court for King County, Case Number 10-2-19384-7
24 SEA, to the United States District Court for the Western District of Washington at Seattle.
25 This removal is authorized pursuant to the Class Action Fairness Act (28 U.S.C. §1332(d),

NOTICE OF REMOVAL
Page 1 of 6

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1453, and 1711-1715) and U.S.C. §§1441 and 1446.

2 **II. PROCEDURAL HISTORY**

- 3 1. On May 28, 2010, Plaintiff Maria Agne, acting on behalf of a putative class of
4 similarly situated persons, filed the instant action in King County Superior Court.
5 A copy of the complaint is attached as *Exhibit A*.
- 6 2. Defendants were served with a copy of the complaint on June 15, 2010. The
7 removal of this action is, accordingly, in accordance with the thirty day timeline for
8 removal set forth in 28 USC §1446(b).
- 9 3. As per 28 USC §1446(d), the removal of this action terminates all proceedings in
10 King County Superior Court.
- 11 4. According to the docket for the King County Superior Court for this action, as of
12 the date of filing this removal, the documents filed in this action are: (1) complaint;
13 (2) summons; (3) service documents; (4) notice of appearance on behalf of these
14 defendants; and (5) notice of appearance on behalf of defendant Papa John's. A
15 copy of the King County docket is attached as *Exhibit B*.

16 **III. BASIS FOR REMOVAL**

- 17 1. Removal of this action is authorized pursuant to the Class Action Fairness Act (28
18 USC §1453 and 28 USC §1332). 28 USC §1332(d)(2) confers "original
19 jurisdiction" in class actions where the amount in controversy exceeds \$5,000,000
20 and minimal diversity exists. *Serrano v. 180 Connect, Inc.* 478 F.3d 1018, 1022
21 (9th Cir., 2007). This is the case here. First, this action is a "class action" as
22 defined by 28 USC §1332(d)(1)(b) and in accordance with 28 USC §1453(b).
23 Second, at least one member of the proposed plaintiff class is a citizen of a state
24 (Washington) different from the state of any defendant (Papa John's USA Inc. is a
25 Kentucky corporation, Papa John's International Inc. is a Delaware corporation and

1 Rose City Pizza is an Oregon LLC). Third, based on the allegations, denied by the
2 defendants, the amount in controversy exceeds the CAFA jurisdictional amount.

3 2. Defendant denies the allegations of the complaint and specifically denies any
4 violation of Washington law. However, based on the allegations in the complaint
5 and the erroneous legal theories alleged, plaintiffs' putative class action has put the
6 CAFA jurisdictional amount in issue.

7 3. Plaintiffs allege that this case is brought as a class action and, therefore, plaintiffs
8 are seeking certification of the putative class under Washington Rule of Civil
9 Procedure 23(a), (b)(2) and (b)(3). Therefore, this action is a proposed class action,
10 defined under 28 USC §1332(d)(1)(B), as "any civil action filed under rule 23 of
11 the Federal Rules of Civil Procedure of similar state statute or rule of judicial
12 procedure authorizing an action to be brought by 1 or more representative persons
13 as a class action."

14 4. A district court shall assert jurisdiction over a class action in which "any member
15 of a class of plaintiffs is a citizen of a State different from any defendant." 28 USC
16 §1332(d)(2)(A). This diversity exists among the parties. Putative class
17 representative, Maria Agne, alleges that she is a resident of Washington State. (Ex.
18 A, ¶2). Ms. Agne seeks to represent a class of plaintiffs who allege wrongful
19 receipt of text messages and allege wrongful receipt of commercial solicitation by
20 means of an automatic dialing and announcing device. (Ex. A, ¶19(a-b)). Rose City
21 LLC is an Oregon LLC. (Ex. A, ¶ 8). Papa John's USA Inc. is a Kentucky
22 corporation. (Ex. A, ¶ 9). Papa John's International Inc. is a Delaware corporation.
23 Accordingly, there is diversity between the putative plaintiff class and the
24 defendants therefore satisfying the requirements of 28 USC §1332 (d)(2)(A).

25 5. This is an action "in which the matter in controversy exceeds the sum or value of

1 \$5,000,000” in accordance with 28 USC §1332 (d)(2). Again, defendants deny
 2 that plaintiffs suffered any damage, however, as alleged, the amount in controversy
 3 does exceed the jurisdictional requirements of CAFA.

4 6. In the instant case, the plaintiff has not pled, with specificity, the amount of
 5 damages, however, plaintiff’s complaint, facially, places the amount in controversy
 6 in excess of the jurisdictional requirements of CAFA. Plaintiffs allege that “at least
 7 several hundred Washington state residents” are believed to be a member of a class
 8 who received text messages and/or commercial solicitation by means of an
 9 automatic dialing system. (Ex. A, ¶22). Plaintiffs further claim statutory damages
 10 for each violation of RCW 19.190.060 (actual damages up to \$5,000 per violation)
 11 and RCW 80.36.400 (\$500 per violation) and claim that damages should be trebled
 12 as per Washington’s Consumer Protection Act (RCW 19.86 *et. seq.*). (*See*
 13 *generally*, Ex. A.)

14 7. As stated in paragraph 7, *supra*, Plaintiffs not only seek their statutory damages,
 15 but, also seek treble damages as well as attorneys’ fees and costs authorized by the
 16 CPA. (*Id.*) When the statute pled in the underlying complaint authorizes an award
 17 of fees, such fees may be included in the amount in controversy. *Galt G/S v. JSS*
 18 *Scandinavia*, 142 F.3d 1150, 1156 (9th Cir., 1998).

19 8. The alleged damages (which plaintiffs intend to treble), including attorneys fees
 20 (authorized by statute), and costs exceed the amount in controversy requirement
 21 (\$5,000,000) under the CAFA.

22 **IV. REMOVAL IS PROPER**

23 1. This Court could have exercised original jurisdiction over this case as per 28 USC
 24 §1332(d)(2) as this is a class action, minimal diversity between the parties exists
 25 and the amount in controversy exceeds \$5,000,000.

1 2. The Western District of Washington embraces King County Superior Court and,
2 therefore, this matter is properly removed to this District. 28 USC §1441(a)

3 3. Written notice of the filing of this Notice of Removal and the removal of the state
4 court action is being delivered to all counsel through their counsel of record. A
5 copy of this Notice of Removal will be filed promptly with the Clerk of King
6 County Superior Court of Washington State, in accordance with 28 USC §1446(d).

7 **V. CONCLUSION**

8 THEREFORE, Defendants respectfully provide notice that the above captioned matter
9 is hereby removed from King County Superior Court to the United States District Court for
10 the Western District of Washington.

11 DATED this 14th day of July, 2010.

12 LAWRENCE & VERSNEL PLLC

13
14
15 By: Vanessa M. Vanderbrug
16 Joseph P. Lawrence, Jr., WSBA No. 19448
17 Vanessa M. Vanderbrug, WSBA No. 31668
18 701 5th Avenue, Suite 4120
19 Seattle, WA 98104
20 Tel: (206) 624-0200
21 Fax: (206) 903-8552
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DECLARATION OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the State of Washington, that on the below date, a true copy of *Notice of Removal* was served on the persons listed below in the manner shown, as follows:

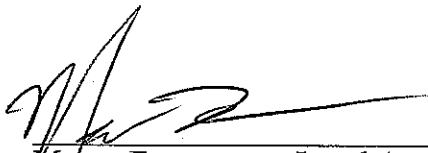
Albert Kirby Esq.
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93 S. Jackson St., Ste. 63230
Seattle, WA 98104-2818
Fax: (866) 845-6302

☒ Legal Messenger
☐ Facsimile
☐ United States Mail, First Class
☒ E-mail
☐ (Other) _____

James Howard Esq.
Dorsey & Whitney LLP
701 5th Avenue
Seattle, WA 98104-7043

☒ Legal Messenger
☐ Facsimile
☐ United States Mail, First Class
☒ E-mail
☐ (Other) _____

DATED this 14th day of July, 2010, at Seattle, Washington.



Megan Fensterman, Legal Assistant to Joseph P. Lawrence, Jr.

EXHIBIT A

RECEIVED
JUN 15 2010
STUART A. HELLER

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

MARIA AGNE, on her own behalf and on
behalf of other similarly situated persons,

Plaintiffs,

v.

RAIN CITY PIZZA, L.L.C., an unknown
business entity; EDWARD
TALIAFERRO, individually and doing
business as RAIN CITY PIZZA, L.L.C.;
KEVIN SONNEBORN, individually and
doing business as RAIN CITY PIZZA,
L.L.C. and ROSE CITY PIZZA, L.L.C.;
ROSE CITY PIZZA, L.L.C., an Oregon
limited liability company; PAPA JOHN'S
USA, INC., a Kentucky corporation; and
PAPA JOHN'S INTERNATIONAL, INC.,
a Delaware corporation,

Defendants.

CLASS ACTION

Case No. 10-2-19384-7 SEA

**COMPLAINT FOR DAMAGES AND
INJUNCTIVE RELIEF**

Plaintiff MARIA AGNE ("Representative Plaintiff"), on her own behalf and on
behalf of all other similarly situated persons (collectively "Plaintiffs"), by and through their
counsel, bring the following Complaint against Defendants RAIN CITY PIZZA, L.L.C.,
EDWARD TALIAFERRO, KEVIN SONNEBORN, ROSE CITY PIZZA, L.L.C., PAPA
JOHN'S USA, INC., and PAPA JOHN'S INTERNATIONAL, INC. (collectively

1 "Defendants") to obtain from each of them all damages, injunctive relief, attorney fees, costs,
2 and other remedies which Plaintiffs are entitled to recover under law and equity.

3 I. JURISDICTION AND VENUE

4 1. This Court has jurisdiction pursuant to RCW 2.08.010 because Plaintiffs
5 request legal relief exceeding \$300.00.

6 2. Representative Plaintiff is a resident of King County in Washington State.

7 3. Many of the wrongful acts and omissions referenced in this Complaint
8 occurred, were initiated, were furthered, or were given assistance in King County and
9 Washington State.

10 4. Several of the Defendants domicile in King County of Washington State.

11 5. Defendants do business in King County and Washington State.

12 II. PARTIES

13 6. Upon information and belief: EDWARD TALIAFERRO and KEVIN
14 SONNEBORN are individuals.

15 7. Upon information and belief: EDWARD TALIAFERRO and KEVIN
16 SONNEBORN own, operate, supervise, manage, control, and/or do business together as
17 RAIN CITY PIZZA, L.L.C. and/or other business entities (collectively "RAIN CITY").
18 RAIN CITY owns, operates, supervises, controls, and/or manages Papa John's Pizza
19 restaurants.

20 8. Upon information and belief: ROSE CITY PIZZA, L.L.C. purports to be an
21 Oregon limited liability company. KEVIN SONNEBORN owns, operates, supervises,
22 manages, and/or does business as ROSE CITY PIZZA, L.L.C. and other business entities
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1 (collectively "ROSE CITY"). ROSE CITY owns, operates, supervises, controls and/or
2 manages Papa John's Pizza restaurants.

3 9. Upon information and belief: PAPA JOHN'S USA, INC. ("PJ'S USA")
4 purports to be a Kentucky corporation. PJ's USA owns, operates, supervises, controls and/or
5 manages Papa John's Pizza restaurants.

6 10. Upon information and belief: PAPA JOHN'S INTERNATIONAL, INC.
7 ("PJ'S INTERNATIONAL") purports to be a Delaware corporation. PJ'S
8 INTERNATIONAL owns, operates, directs, supervises, controls, manages, and/or does
9 business as PJ'S USA. PJ'S USA is an alter ego and/or agent of PJ'S INTERNATIONAL.

10 11. Upon information and belief: PJ'S USA and PJ'S INTERNATIONAL
11 (collectively "PJ'S CORPORATE") supervise, control, manage, and/or assist all individuals
12 and business entities who own, operate, supervise, control and/or manage Papa John's Pizza
13 restaurants. Without limitation on the foregoing, PJ'S CORPORATE supervises, controls,
14 directs, manages, and/or assists the marketing and advertising of all Papa John's Pizza
15 restaurants.

16 12. Defendants do business under the trade name of "Papa John's Pizza" and/or
17 "Papa John's."

18 III. GENERAL ALLEGATIONS

19 13. "Papa John's Pizza" and/or "Papa John's" are trade names used by an
20 international consortium of individuals and business entities who seek profit from selling
21 pizzas and pizza-related products and services to consumers and each other.

22 14. PJ'S CORPORATE is at the apex of the international Papa John's Pizza
23 consortium, and it trains, manages, directs, controls, audits, supervises, and/or assists the
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1 ownership and management of every Papa John's Pizza restaurant with regard to their
2 marketing, operations, and training.

3 15. Under the direction, supervision, and/or control of PJ'S CORPORATE and/or
4 each other, Defendants collaborate, agree, ratify, and/or determine what Papa John's Pizza
5 products and services shall be sold and in what manner and to whom these products and
6 services shall be marketed and advertised.

7 16. As stated on the 2010 first quarterly report of PJ'S CORPORATE,

8 *Today, more than 25 percent of all Papa John's sales come online or through text,*
9 *widget, or mobile device, and the company believes sales via alternative access*
10 *channels could one day surpass traditional telephone orders.*

11 17. Defendants have placed a tremendous focus on "alternative advertising" to
12 drive these sales. As a consequence of the joint, combined, collaborative, and collective
13 marketing and advertising efforts, agreements, contributions, and acts of the Defendants and
14 others, Defendants have sold billions of dollars of Papa John's Pizza products and services to
15 consumers.

16 18. Directly or through authorized agents, Defendants engaged in unlawful and
17 otherwise wrongful marketing and advertising practices to the damage of Representative
18 Plaintiff and persons similarly situated. Thus, Defendants caused the transmission of
19 unsolicited electronic commercial text messages to telephone numbers assigned to
20 Representative Plaintiff and other residents of Washington State for cellular or pager services
21 equipped to receive such messages. Also, Defendants caused automatic dialing and
22 announcing devices to be used for purposes of commercial solicitation of Representative
23 Plaintiff and other telephone customers within Washington State.
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IV. CLASS ACTION ALLEGATIONS

19. Representative Plaintiff brings this class action pursuant to Civil Rule 23 on behalf of herself and as a representative of the following class of persons entitled to remedies including, but not limited to, damages:

- a. All residents of Washington State with a cellular telephone number or pager number to which an electronic commercial text message was transmitted by a Defendant, or someone acting on behalf of a Defendant; and
- b. All residents of Washington State to whose telephone or pager number a Defendant, or someone acting on behalf of a Defendant, directed a commercial solicitation by means of an automatic dialing and announcing device.

20. Representative Plaintiff also brings this class action pursuant to Civil Rule 23 on behalf of herself and as a representative of the following class of persons entitled to injunctive relief:

- a. All residents of Washington State with a cellular telephone number or pager number in the possession, custody, or control of a Defendant.

21. Plaintiffs' class claims satisfy all of the requirements for class action certification pursuant to Civil Rule 23(a) and 23(b)(1), 23(b)(2), and 23(b)(3).

22. Satisfying all requisite numerosity requirements, at least several hundred Washington State residents are believed to belong to the class. As a result, joinder of all class members in a single action is impracticable. Defendants are in exclusive possession of the exact number of persons in the class, so discovery as to this matter should be provided immediately. Class members may be informed of the pendency of this class action through direct mail.

1 23. There are questions of fact and law common to the class, which predominate
2 over any questions affecting only individual members. The questions of law and fact
3 common to the class arising from Defendants' conduct include, without limitation, the
4 following:

- 5 a. Whether Defendants negligently and/or willfully caused
6 violations of the Washington Consumer Protection Act;
- 7 b. Whether Defendants negligently and/or willfully caused
8 violations of RCW 19.190.060;
- 9 c. Whether Defendants negligently and/or willfully caused
10 violations of RCW 80.35.400;
- 11 d. Whether Defendants, or someone acting on their behalf, caused
12 transmissions of commercial text messages to residents of
13 Washington State;
- 14 e. Whether Defendants, or someone acting on their behalf,
15 utilized automatic dialing and announcing devices for
16 commercial solicitations to residents of Washington State;
- 17 f. Whether Defendants' practices and policies will cause further
18 violations of the Washington Consumer Protection Act;
- 19 g. Whether Defendants' practices and policies will cause further
20 violations of RCW 19.190.060;
- 21 h. Whether Defendants' practices and policies will cause further
22 violations of RCW 80.35.400; and
- 23 i. Whether Defendants conspired together to perpetuate unlawful
24 and/or wrongful practices and conduct.

25 24. The questions set forth above predominate over any questions affecting only
26 individual persons, and a class action is superior with respect to considerations of
consistency, economy, efficiency, fairness and equity, to other available methods for the fair
and efficient adjudication of Plaintiffs' claims.

1 25. Representative Plaintiff's claims are typical of those of the class in that she
2 received on her cellular telephone phone multiple unsolicited commercial text messages and
3 commercial solicitations that were the same or substantively similar to those transmitted and
4 directed to the class. The transmission of these unsolicited commercial text messages and
5 commercial solicitations violate RCW 19.86.10, *et seq.*, and related statutes, and they are in
6 substance the type of commercial text message and commercial solicitation that would be
7 transmitted and directed to numerous individuals.

8
9 26. A class action is the appropriate method for the fair and efficient adjudication
10 of this controversy. Defendants' have acted in a general manner to the damage of the class.
11 The presentation of separate actions by individual class members could create a risk of
12 inconsistent and varying adjudications, establish incompatible standards of conduct for
13 Defendants, and/or substantially impair or impede the ability of class members to protect
14 their interests.

15 27. Further, Defendants have indicated that they will continue the "alternative
16 advertising" of the type that has damaged Representative Plaintiff and the class in violation
17 of applicable statutes. Accordingly, final injunctive relief is necessary and appropriate to
18 ensure that Defendants cease and desist their unlawful and wrongful conduct. A class action
19 is the most efficient means to ensure that Defendants' do not damage the class in the future.

20
21 28. Representative Plaintiff is an adequate representative of the class because she
22 is a member of the class and her interests do not conflict with the interests of the members of
23 the class she seeks to represent. The interests of the members of the class will be fairly and
24 adequately protected by Representative Plaintiff. Also, Representative Plaintiff is

COUNT I

30. Plaintiffs reassert and re-allege the allegations set forth in the above paragraphs.

32. Defendants' practices are unfair and deceptive and otherwise negligently, recklessly, willfully, and/or intentionally cause numerous *per se* violations of RCW 19.86.10, *et seq.*, including, but not limited to, violations of RCW 19.190.060 and/or RCW 80.35.400.

COMPLAINT
Page 8

34. Defendants' conducted these practices in the scope of their trade – selling pizzas and pizza-related products and services.

35. Plaintiffs have suffered damages as a direct result of Defendants' numerous violations of RCW 19.86.10, *et seq.*

36. Plaintiffs were thereby damaged in an amount no less than \$500.00 per each of the numerous violations of RCW 19.86.10, *et seq.*, or such greater amount as may be proven at trial.

37. Plaintiffs will continue to be damaged if Defendants are not compelled to cease and desist their unfair, deceptive, and unlawful practices.

38. Plaintiffs are further entitled to all attorneys' fees, costs, and treble damages as allowed by RCW 19.86.10, *et seq.*

COUNT II

Negligence

39. Plaintiffs reassert and re-allege the allegations set forth in the above paragraphs.

40. Defendants owed a duty to act in the manner of reasonable pizza consortium and/or restaurant in their relationships with Plaintiffs and in supervising, managing, and training their officers, agents, employees, each other, and other persons under their control.

41. Defendants breached their duties by permitting, causing, suffering, requiring, and/or ratifying the acts and omissions which have damaged Plaintiffs as referenced herein.

42. The breach of duties, or negligence, of Defendants proximately caused Plaintiffs to suffer damages in amounts to be determined at trial.

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V. PRAYER FOR RELIEF

WHEREFORE, Representative Plaintiff, and all others similarly situated, demand judgment against Defendants and pray this Superior Court do the following:

A. Grant a permanent injunction enjoining Defendants, their officers, successors, agents, assigns, and all persons in active concert or participation with them, from engaging in any other unfair, deceptive, or unlawful practices concerning the transmission of commercial text messages and commercial solicitations to Representative Plaintiff and other class members.

B. Order Defendants to make Representative Plaintiff and the other class members whole by providing compensation for past and future pecuniary losses resulting from the unlawful practices described in the above paragraphs, including out-of-pocket expenses, in amounts to be determined at trial, but in no event less than \$500.00 per violation of RCW 19.86.10, *et seq.*

C. Order Defendants to make Representative Plaintiff and the other class members whole by providing compensation for past and future non-pecuniary losses resulting from the unlawful practices described in the above paragraphs, in amounts to be determined at trial.

D. Order Defendants to make Representative Plaintiff and the other class members whole by providing appropriate prejudgment interest, in an amount to be determined at trial, and other affirmative relief necessary to eradicate the effects of its unlawful practices.

E. Order Defendants to pay Representative Plaintiffs and the other class members punitive and/or treble damages to the fullest extent allowed by law.

1 F. Award Representative Plaintiff and the other class members the costs of this
2 action, including attorneys' fees, as authorized by the Washington Consumer Protection Act
3 and/or as sounds in tort and contract.

4 G. Grant any additional or further relief as provided by law, which this Court
5 finds appropriate, equitable, or just.
6

7 Dated: May 28, 2010

Respectfully submitted,

KIRBY LAW GROUP

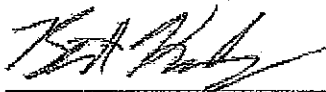
9
10 
11 By: Albert H. Kirby, WSBA No. 40187
12 Attorneys for Plaintiffs
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EXHIBIT B


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Superior Court Case Summary

Court: King Co Superior Ct**Case Number:** 10-2-19384-7

Sub	Docket Date	Docket Code	Docket Description	Misc Info
1	05-28-2010	COMPLAINT	Complaint For Damages & Injunctive Relief	
2	05-28-2010	SET CASE SCHEDULE JDG0005	Set Case Schedule Judge Steven Gonzalez, Dept 5	11-14- 2011ST
3	05-28-2010	CASE INFORMATION COVER SHEET LOCS	Case Information Cover Sheet Original Location - Seattle	
4	05-28-2010	SUMMONS	Summons	
5	06-17-2010	AFFIDAVIT/DCLR/CERT OF SERVICE	Affidavit/dclr/cert Of Service	
6	06-17-2010	AFFIDAVIT/DCLR/CERT OF SERVICE	Affidavit/dclr/cert Of Service	
7	06-21-2010	AFFIDAVIT/DCLR/CERT OF SERVICE	Affidavit/dclr/cert Of Service	
8	06-24-2010	AFFIDAVIT/DCLR/CERT OF SERVICE	Affidavit/dclr/cert Of Service	
8A	06-30-2010	AFFIDAVIT/DCLR/CERT OF SERVICE	Affidavit/dclr/cert Of Service	
9	07-01-2010	NOTICE OF APPEARANCE	Notice Of Appearance /defts	
10	07-02-2010	AFFIDAVIT/DCLR/CERT OF SERVICE	Affidavit/dclr/cert Of Service	
11	07-02-2010	NOTICE OF APPEARANCE	Notice Of Appear/papa Johns Intl	
12	07-06-2010	NOTICE OF APPEARANCE	Notice Of Appear/papa Johns Usa	

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If you are viewing a district municipal, or appellate court docket, you may be able to see future court appearances or calendar dates if there are any. Since superior courts generally calendar their caseloads on local systems, this search tool cannot display superior court calendaring information.

Contact Information

King Co Superior Ct
516 3rd Ave, Rm C-203
Seattle, WA 98104-2361

Map & Directions
206-296-9100[Phone]
206-296-0986[Fax]

Visit Website
206-205-5048[TDD]

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